

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

WANDA COOPER, in her individual capacity and as administrator of the estate of the decedent, Ahmaud Arbery,

Plaintiff,

CIVIL ACTION NO.
2:21-CV-00020-LGW-BWC

TRAVIS McMICHAEL, GREGORY
McMICHAEL, WILLIAM BRYAN,
POLICE OFFICER ROBERT RASH,
POLICE OFFICER JOHN POWELL,
JOHN DOE POLICE OFFICIALS 1-10,
GLYNN COUNTY, JACKIE JOHNSON,
and GEORGE BARNHILL.

Defendants.

DEFENDANT GEORGE BARNHILL'S MOTION TO STAY DISCOVERY

COMES NOW GEORGE BARNHILL, Defendant in the above-styled civil action and pursuant to Fed. R. Civ. P. 26(d), files this Motion to Stay Discovery based on Defendant Barnhill's pending Motion to Dismiss. Defendant Barnhill incorporates by references the accompanying Brief in Support of this Motion.

WHEREFORE, Defendant Barnhill requests that his Motion be GRANTED and that the Court stay discovery pending the final resolution of his Motion to Dismiss.

(Signature on following page)

This 13th day of July, 2021.

APPELBAUM HENEFELD GREEN, P.C.

/s/ Noah Green

Noah Green

Georgia Bar No. 468138

Attorney for Defendant George Barnhill

9 Lenox Pointe NE, Suite B
Atlanta, Georgia 30324

(404) 841-1275

ng@aps-law.com

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

WANDA COOPER, in her individual capacity and as administrator of the estate of the decedent, Ahmaud Arbery,

Plaintiff,
v.

TRAVIS McMICHAEL, GREGORY McMICHAEL, WILLIAM BRYAN, POLICE OFFICER ROBERT RASH, POLICE OFFICER JOHN POWELL, JOHN DOE POLICE OFFICIALS 1-10, GLYNN COUNTY, JACKIE JOHNSON, and GEORGE BARNHILL,

Defendants.

CIVIL ACTION NO.
2:21-CV-00020-LGW-BWC

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing parties with a copy of **Defendant George Barnhill's Motion to Stay Discovery** by filing same with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

This 13th day of July, 2021.

APPELBAUM HENEFELD GREEN, P.C.

/s/ Noah Green

Noah Green

Georgia Bar No. 468138

Attorney for Defendant George Barnhill

9 Lenox Pointe NE, Suite B
Atlanta, Georgia 30324
(404) 841-1275
ng@aps-law.com